

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 HAWTHORNE STREET  
SAN FRANCISCO, CA 94105

August 25, 1991  
Tim Leftwich  
Santa Fe Pacific Minerals  
Director-Environmental Quality  
6200 Uptown Blvd, NE Suite 400  
Albuquerque, NM 87110

RE: Site Stabilization Work Plan Pursuant to EPA Order 91-16.

Dear Mr. Leftwich:

As discussed in our telephone conversation on August 25, 1991, the Environmental Protection Agency ("EPA") has reviewed your draft Site Stabilization Plan for Section 19 of the Bluewater Uranium Mine Sites pursuant to EPA Order 91-16. Overall, the plan provides adequate information on how your company intends to conduct the required response actions. However, EPA is requesting that the following comments be addressed.

SPECIFIC COMMENTS

- \* Section III - Please expand on how the survey grid was delineated and performed. Explain in greater detail what a "modified 50 foot grid" means. Include the names of who conducted the survey and the technique utilized.
- \* As discussed in our conversation, there appears to be some discrepancies between the field gamma measurements recorded by EPA versus the data presented in Attachment C.

On August 24, 1991, EPA personnel conducted a random survey within your Sector 7 and found the gamma readings to be well above 150 uR/hr in nearly all portions the section at waist level. In addition "hot spots" were recorded to exceed 500 uR/hr at waist level. Attachment C from your report records gamma readings within sector 7 to range from 40 uR/hr to a maximum of 150 uR/hr. Area within this sector near the service road contains piles of exposed limestone and protore containing yellow streaks.

EPA is concerned over this discrepancy in field data and is requesting that you reverify portions of the data where the Todilto limestone, protore and waste piles are exposed. EPA is willing to conduct field comparisons with your staff in the field during the week of August 26, 1991.

In addition, an attempt should be made to locate areas of elevated gamma radiation within the grid spacings to clearly delineate "hot" spots. EPA believes this task is important to further characterize elevated zones and potential on-site fill.

\* Section III - A statement should be added within the text and on Attachment C that the Ludlum 19 conversion factor of .7 for Cesium-137 calibration has yet to be applied; and therefore, all values present on the map should be multiplied by 1.43 (or divided by .7).

\* The submitted plan failed to provide EPA with a work schedule. Please submit a work schedule outlining tentative dates for the specific tasks proposed in your plan.

#### CORRECTIONS

\* Section IV - typo (extend) extent possible

\* Section IV - typo gentle (clopes) slopes

Pursuant to the Order, the Respondents shall resubmit the plan to EPA within seven (7) calendar days. Please resubmit the plan to me on-site or at The Inn-Best Western, Grants, New Mexico. If you have any questions or concerns, please contact me at 415-744-2298.

Sincerely,



Robert Bornstein  
Federal On-Scene-Coordinator  
Emergency Response Section

cc: Linda Wandres, ORC  
Robert Krebs, ATSF  
George Wagner, Cerrillos Land Company